CENTRAL INTELLIGENCE AGENCY WASHINGTON, D.C. 20505

4 April 1980

MEMORANDUM

SUBJECT: The Process of Converting to APEX

The attached memorandum on "The Process of Converting to APEX" reflects collective thinking of the APEX Steering Group, as of approximately 1 April 1980. The learning process regarding APEX continues, and no guarantee of immutability is attached to that which follows. It is to be used simply as a guide to understanding the conversion process. NFIB must review and concur as milestones are reached in the conversion of APEX. Questions should be directed to your respective system security officer who can, in turn, contact your agency's APEX Steering Group Member.

Chairman, APEX Steering Group

Attachment

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4 April 1980

The Process of Converting to APEX

- 1. A new special access control system for compartmentation, called APEX, has been approved by the President and is being readied for introduction. The inauguration of the APEX system will touch all of us who presently deal with compartmented information. It will bring about a number of changes in the way the Intelligence Community conducts its business. Some of these changes are merely administrative in nature, some are designed to improve compartmented security practices, while others should bring about a significant decrease in the total amount of compartmented material.
- 2. The most significant aspect of APEX is the establishment of a single and uniform control system for all compartmented intelligence information. Many of the complexities and inconsistencies will be eliminated that presently exist in the numerous and autonomous systems. There will be single Government and Industrial manuals for the implementation of policy. Along this same central theme is the establishment of a central organization, the APEX Steering Group, to promulgate and monitor APEX security policies and procedures, as well as a central clearance and access certification unit to be known as the Central APEX Access Registry. The latter will provide the capability to verify

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access approvals and to monitor security and administrative aspects of each APEX program.

- 3. The discontinuation of separate control systems (e.g., TK, SI) in favor of the new APEX Control System will necessitate certain changes in procedure. The former control system caveats and color codes will no longer guide the dissemination of a document. Instead, the document will be color-coded as being in one of the APEX categories, and its routing will be determined by the project name(s), codeword(s), subcompartment indicator(s), or product indicator(s) on the cover sheet and on the document. This means that the control facilities must be converted from an operating mode based upon individual control system accreditation to one based upon certification for specific operational projects, subcompartments and products. The accompanying conversion of individual access will be somewhat simpler. but will still require changing the concept from one in which the individual had access to a general control system to one based upon access approvals for specific operational projects, subcompartments, or categories of product.
- 4. The advantages of single uniform policies in the administration of APEX are complemented by several security changes which are designed to permit maximum dissemination of intelligence at collateral levels and to protect, within compartmentation channels, intelligence which clearly warrants special protection. The specific separation

between operational and product compartments is expected to result in a decline in the number of people having access to operational data. The use of operational subcompartments will help avoid the spill-over of operational data into product compartments, providing better protection for that sensitive data clearly warranting protection. The requirement for each SIO to grant access on a need-to-know basis and to certify this need each year, along with attributing intelligence to generic sources instead of to specific collection platforms, are yet other changes enhancing protection. However, in order to realize these advantages, all members of the APEX Community must cooperate and coordinate their efforts. For example, maximum dissemination at collateral levels is entirely dependent on everyone sanitizing and decompartmenting at an increased volume in accordance with APEX threshold criteria. Not only must all APEX material be sanitized and decompartmented to the maximum, but all pre-existing SCI must receive the same attention. The basic rule of the intelligence producer should be to disseminate sanitized and decompartmented reports, studies, analyses and memoranda. Reserve for APEX control only that data that clearly warrants such restrictive protection. As an adjunct to maximum sanitization and dissemination, the classification of data as TOP SECRET must continually be reviewed. Failure to accomplish this review could lead to the saturation of the APEX Control System with unnecessary TOP SECRET data.

5. The direction to execute the APEX Control System has not, to date, been issued by the DCI. The initial step is to indoctrinate

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-3-CONFIDENTIAL

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and orient the many thousands of people, who now have access to various forms of compartmented data, as to what the APEX system is, how it will affect them, and what changes they can expect. The number one villain in this orientation process is resources, i.e., time and personnel. A specific date for implementation of APEX has not been established. The DCI desires, however, that APEX be implemented no later than January 1981. Preliminary data indicates that to indoctrinate all persons who now have access to compartmented information will require three to six months by each agency and department. This is due to physical location and nonavailability of personnel due to various reasons, e.g., PCS, leave, TDY, illness.

6. The planning for such a mammoth orientation program has been tackled by two working subgroups of the APEX Steering Group. The subgroups are working on the orientation of Government employees, in accordance with the Security Manual for Government and the orientation for contractors as prescribed in the Security Manual for Industry. These two audiences are very much different in their makeup and problems. Within these groupings exist unique situations apropos to their own environment which require special attention and handling. In order to assist these populations to convert to APEX in a manner not disrupting normal day-to-day operations, and to create as little confusion as necessary, the major command and agency security and administrative personnel will attend a seminar designed to expose them

-4-CONFIDENTIAL

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to and interpret the APEX system. In turn, this nucleus will orient the personnel of their organizations on the basic APEX system concept, while tailoring their remarks to the individual registries and working units. Indoctrination plans are also being worked out for the industrial program. Unique situations arise in this area because of variations in contractor size, the Government sponsoring agency (with multiple confusing manuals and instructions in existence), the possibility of the same contractor having multiple contracts with more than one Government agency and the various techniques which tend to vary. The program being developed will provide to the contractors a uniform explanation of the APEX system. It will be presented by the US Government sponsor or cognizant contract manager.

7. To uniformly present and explain APEX, a videotape has been produced which provides a general orientation into the new system. It is the desire of the APEX Steering Group that this film be viewed as a jumping-off point in the overall indoctrination program. To further assist secretaries, administrative and registry people, another videotape is being produced to provide additional detail and specific criteria for the conversion to APEX. Additional videotapes and film will be produced to assist specific audiences in conversion if required. Likewise, annexes to the basic security manuals will be produced if problem areas requiring further explanation are identified. To assist in the seminars, a package is being prepared which will present questions and

-5-CONFIDENTIAL

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answers on a broad range of APEX topics. Additional Q and A's resulting from the seminar, when combined with those already prepared, will form a basis for all security officers to have a broad background in order to field questions from their respective organizations.

The concept of conversion from the present compartmented systems to the APEX system is relatively simple. The numbers of people involved, their physical location and the local habits of operating under past systems, however, combine to make the actual conversion somewhat complex, manpower intensive and time-consuming. Even after APEX begins, we will continue to have a mix of the old and the new which will require maintenance of both systems. A possible solution to this would be the "stopping" of all activity, striking over, or obliterating present project name(s), codeword(s), and nickname(s)/source indocator(s), as appropriate, and restamping or affixing the new APEX terminology and control numbers to the document. For those facilities which have relatively few documents, this approach would be feasible. For libraries and those offices having many thousands of documents, however, a "stop and convert" process would be physically impossible. We are, therefore, faced with a reality that for some years we must concurrently maintain documents labeled and controlled under past compartmented systems, as well as under the new system.

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9. As we dig deeper into the conversion process, we find more and more unique sets of problems. The thought of having documents marked and controlled under two systems (one of which theoretically no longer exists) is a sobering thought, but it must be addressed. It is envisioned that as present documents become outdated, obsolete, and/or destroyed, holdings of such documents will be reduced. When holdings in existing systems are not retired or otherwise disposed of, the ASO/ACO and or US Government sponsor or contract monitor, in the case of contractors, will be able to make a conscious decision to terminate the access under an old compartment and convert completely to the APEX system. In this case, all holdings in the old systems must be remarked and controlled in accord with APEX. In the case of libraries holding large amounts of microfilm and microfiche, it very well may be time and cost prohibitive to ever convert all of their holdings. The ASO/ACO and CASO/CACO, working with analysts, engineers and all those people within compartmented systems can, with a positive approach, go a long way towards the achievement of having holdings controlled under one system. Each institutional holder of such documents is encouraged by the APEX Final Report to institute a program for an obligatory quantitative reduction in current holdings of documents issued in operational control systems. It is emphasized, however, that this does not mean that important segments of the Community data base be destroyed to ease the administrative burdens of conversion. Necessary analytical and historical files should be retained.

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- 10. When the start date for APEX implementation is announced, it is imperative that the beginning of APEX be conducted in a conducive atmosphere. A first step in this approach would be to reduce the present holdings of all compartmented data. This can start NOW; there is no requirement to wait, but there is a distinct advantage to starting immediately. Everyone maintains documents which are outdated and obsolete; their destruction and clean-out now would be a positive step in converting to the new APEX system. The requirement to conduct annual inventories of all hard copy TOP SECRET APEX documents and to annually conduct random audits on all other hard copy APEX material should provide a strong incentive. In this regard, it must be emphasized that there is no, repeat no, requirement for retrofit. Everyone is encouraged to reduce holdings, to recontrol documents under the APEX system when used (as in the case of libraries), and to have the ASO/CASO institute a positive program for the complete conversion to the APEX system. It is realized that not all ACF/CACF's will be able to do this, and it is acknowledged that a mix of the old and new systems will exist for some time to come.
- 11. An APEX Nondisclosure Agreement is being formulated which will be signed by each indoctrinated person granted access to APEX material. This agreement will be required only once and will be accomplished upon receiving the orientation briefing. The indoctrination and agreement will be performed and recorded by the ASO/CASO. The agreement will indicate that the individual has received the APEX

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-8-CONFIDENTIAL

orientation briefing and may be provided specific accesses under the APEX system when authorized by the SIO. It is imperative that personnel now indoctrinated for compartmented access who will continue to require such access be APEX-oriented and that this action be recorded by the ASO/CASO in order to facilitate the across the board orientation and to help determine who may still require such a briefing. When an individual has executed an APEX Nondisclosure Agreement, access to individual programs will be granted by the appropriate SIO on a needto-know basis. A record of the individual's access to different programs and projects will be recorded by each SIO as he finds necessary and will, of course, be transmitted to the Central APEX Access Registry. Program and Project access forms will be redundant to the access record in the Central APEX Access Registry but may be maintained to provide a specific audit trail of accesses granted or withdrawn by date. At the time of indoctrination for each new access, the ASO/CASO will remind the person of his/her responsibilities as stipulated on the previously signed Nondisclosure Agreement.

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12. The fact of no retrofit creates a situation whereby documentation will exist and be controlled under more than one system. We will experience the necessity to convert accesses into the new APEX system on a one-for-one basis at the outset, subject to the determination of each SIO. To be specific, this means that if the SIO determines that each person in his organization requires the APEX access equivalent to

the access now held, he may convert on a one-for-one basis. The current access registry held by various organizations already indicates the various project names/codewords to which specified individuals have already been granted access. In the case of operational compartments, these same project names, preceded by the term APEX, will be used. In the case of product, various source indicators will be replaced with the generic term IMAGERY, HUMINT, COMINT, TECHNICAL. There will necessarily be some short period of time required to administratively accomplish this, and common sense must govern the application, because one set of rules or guidance cannot cover all situations. Conversion will begin modestly for documentation, but will be more rapid for the individual accesses which must be applied. The ASO/CASO will be given conversion/ equivalency tables for access in order to convert the old to the new. Those equivalencies that each ASO/CASO will require will be provided on a need-to-know basis. An all-inclusive conversion table for all projects, subcompartments, etc., cannot be published because of the security problems involved.

the SIO, who will be required to individually screen each of his people, establish their need-to-know, and grant the required access.

In the case of operational and operational subcompartmented material, the SIO, after receiving approval from the program manager, will grant access. This screening process should begin as soon as practicable. It

will also be necessary to rewrite the various user manuals and documentation

13. A very important aspect of the APEX conversion rests with

which, in the past were produced specifically for the analyst, tasker, etc., and which contain a great deal of what is now established as operational data. The new operational subcompartments will contain that information which the program managers and user SIOs have agreed upon in order for the user to accomplish his/her job while, at the same time, restricting to operational compartments that data which the program managers and SIOs agree the user does not need to know. Preparation of this new subcompartment data (designated by an ALPHA suffix) may not be completed by the time implementation of APEX has begun. APEX is a new single compartmented control system and, as such, will have its growing pains. The rewriting of user manuals, which will form the informational basis of the operational subcompartments, is essential to the establishment by the SIOs of the requirement for access by persons in their organizations.

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- 14. There is a need to rigorously implement the APEX Threshold Criteria in order to substantially limit the amount of material to be handled in the APEX system. The handling of most APEX imagery-derived information, as well as formerly compartmented ELINT reporting at standard levels of classification, will substantially reduce the amount of material that needs to be handled in APEX. Thus, the APEX transition will rest heavily upon rapid adoption and implementation of the Threshold Criteria.
- 15. Directives for each of the various programs and generic sources of APEX data are in the process of being prepared. Until these

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have been completed, existing rules and regulations, including those pertaining to emergency and exercise use of compartmented data, will continue to be followed.

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Once the indoctrination/orientation phase is completed, the execution of APEX can be directed. At initiation, the immediate difference will be that the phrase "HANDLE VIA APEX CONTROL SYSTEM" will replace the system caveats representing several systems presently in use. This will mark the conversion into the APEX system. Secretarial and administrative personnel will use this phrase on all newly created compartmented documents, as well as using new APEX logo and cover sheets. New stamps and cover sheets will be supplied through the APEX Control Staff. The use of new APEX control numbers will also begin, as explained in the security manuals. Administrative personnel should be cautioned not to discard or dispose of old system stamps because they may continue to be required for some period of time. The APEX system departs from customary practice in its treatment of operational project codewords. The APEX system does not permit operational codewords to be compartmented but does allow them to be protected at the standard classification level of CONFIDENTIAL or SECRET. As a reminder, no new markings (retrofit) need be applied to existing markings at the initiation of APEX.

17. Personnel who do not require substantive access to individual APEX compartments, but who require physical access or who administratively process APEX materials, will be given an administrative access called

APEX-GENERAL. This may be given in two phases. Phase I will be granted to those personnel who must have physical access to APEX areas, but do not physically see or process clear text APEX materials. Personnel who might require Phase I access are guards, couriers carrying APEX material in sealed pouches, and technical people such as switching center and computer technicians. Phase II will be granted ONLY to those personnel who process substantive clear text APEX materials in an administrative capacity. Personnel who might require Phase II access include secretaries, distribution personnel, communications center and ADP output device operators, and document control personnel. Individuals who require substantive data will not be granted an APEX-GENERAL access. The intended use is only for those categories of personnel as described above.

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	any change
will be dealt with on an individual basis and reflect APEX	(conventions
in varying degrees, if at all.	

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19. The conversion process may result in some confusion at its inception and will take years to complete. Three very important tasks which should start as soon as possible are: (1) the reduction of present holdings which are not absolutely required, (2) the review by the SIO for each individual presently having access to compartmented information (resulting in a conscious decision of what access they require under APEX), and (3) the writing of operational compartment and subcompartment manuals by program managers in conjunction with the user community. It is imperative that the indoctrination/orientation of persons proceed as rapidly as possible. This must be accomplished as a first step to APEX being instituted and can be done prior to the creation of subcompartment documentation or review of accesses by the SIOs. It is a Community-wide effort which requires the assistance and cooperation of all concerned. A good faith effort by everyone involved will make the task easier.

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The Director of Central Intelligence

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Washington, D. C. 20505

12 February 1980

APEX STEERING GROUP CHARTER

Pursuant to the National Security Act of 1947, as amended, Section 102(d); Executive Order 12036, Subsections 1-601 (h) and (i); Executive Order 12065, Section 4-2; Presidential Directive/NSC-55 of 10 January 1980; and DCI Memorandum of 10 January 1980 for Principals, National Foreign Intelligence Board, the APEX Steering Group is established to assist in ensuring that the Intelligence Community's compartmentation policies and procedures effectively and consistently protect intelligence sources and methods while also ensuring timeliness and economy in the handling of sensitive compartmented information.

Mission: The mission of the APEX Steering Group is to assist the Director of Central Intelligence in establishing and operating a single Community special access system for national foreign intelligence called APEX. The intent of APEX is:

- 1. to protect particularly sensitive intelligence sources and methods;
- 2. to ensure establishment of policies and procedures to control information on the operational details of the most sensitive intelligence sources and methods and intelligence product that can reveal such information:
- 3. to ensure uniform security standards governing access to, distribution of and protection of intelligence sources and methods, subject to any specific statutory requirements and executive directives applicable to any department or agency.

Functions: The functions of the APEX Steering Group include:

Review, formulate and recommend to the National Foreign Intelligence Board and the Director of Central

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Intelligence, policies, guidelines and standard procedures related to the implementation of the APEX Special Access Control System. In fulfilling this requirement, the APEX Steering Group will:

- a. Formulate, coordinate and promulgate guidance for the administration of the APEX system at all echelons of department and agency activities, including those involving contractor and consultant support activity;
- b. Task, guide, assist and monitor the activities of the Committee on Imagery Requirements and Exploitation (COMIREX), the SIGINT Committee, the Security Committee, other relevant committees, and managers of executive agent programs in discharging their responsibilities relevant to the conversion to APEX in accord with the December 1979 Report of the NFIB Working Group on Compartmentation;
- c. Energize, monitor and oversee the conversion of current systems of compartmentation to APEX control;
- d. Guide, assist and monitor departments and agencies in implementing maximum dissemination, decompartmentation and sanitization of APEX material;
- e. Staff for the DCI any appeals arising during implementation of the APEX program;
- f. Assist the Special Assistant to the DCI for Compartmentation in discharging his responsibilities;
- g. Obtain from departments and agencies participating in the APEX program information needed to ensure accurate and detailed reports to the National Foreign Intelligence Board and the DCI on the progress of implementation, problem areas and recommendations for improvements, and to make such reports at appropriate intervals but not less than on a quarterly basis.

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Composition: The APEX Steering Group will be chaired by the Special Assistant to the DCI for Compartmentation who will be supported by the APEX Control Staff. The APEX Steering Group will be composed of representatives of appropriate member organizations of the National Foreign Intelligence Board, the DCI COMIREX, SIGINT, and Security Committees and managers of executive agent programs. The Chairman, on his own initiative or that of a member of the Steering Group, may invite a representative of any other Department or Agency having functions related to matters being considered by the Steering Group.

The Chairman will establish panels and ad hoc working groups as he finds necessary, assuring that their composition represents an opportunity for joint coordinated efforts of program managers and users of their products.

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